STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 176

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Petition to Revise Commission Rules

R8-63 and R8-64

) MOTION OF THE

PUBLIC STAFF FOR

) EXTENSION OF TIME

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully moves the Commission to extend the deadline for the filing of reply comments in Docket No. E-100, Sub 176. In support of this motion, the Public Staff respectfully shows the Commission the following:

- 1. On August 19, 2021, the Public Staff filed a Petition to Amend Commission Rules R8-63 and R8-64.
- 2. On September 20, 2021, the Commission issued an Order Requesting Comments, allowing parties to file initial comments on or before October 19, 2021, and allowing parties to file reply comments on or before November 16, 2021.
- 3. The North Carolina Sustainable Energy Association (NCSEA), the Carolinas Clean Energy Business Association (CCEBA), the Carolina Industrial Group for Fair Utility Rates I, II, and III, and the Carolina Utility Customers Association, Inc., all timely intervened in this docket.

- On October 12, 2021, CCEBA filed a Motion for Extension of Time to File Comments.
- 5. On October 19, 2021, the Commission issued an Order Granting Extension, extending the deadline for the filing of initial comments to November 2, 2021, and extending the deadline for the filing of reply comments to November 30, 2021.
- 6. On November 2, 2021, NCSEA and CCEBA each filed initial comments in this docket.
- 7. Because of the press of other ongoing dockets and deadlines, including hearings on merchant plant applications and comments on the rulemaking for performance based ratemaking, as well as the upcoming holiday, the Public Staff requires additional time to review the initial comments filed in this docket and provide thorough reply comments.
- 8. A two-week extension would provide the Public Staff with sufficient time to review the information in this docket and file reply comments.
- 9. The Public Staff therefore requests that the Commission extend the deadline for the filing of reply comments by two weeks, to December 14, 2021.
- 10. The Public Staff has contacted counsel for other parties in this docket and is authorized to represent that no party objects to this motion.

WHEREFORE, the Public Staff respectfully requests that the Commission issue an order extending the deadline for the filing of reply comments to December 14, 2021.

This the 22nd day of November, 2021.

PUBLIC STAFF Christopher J. Ayers Executive Director

Dianna W. Downey Chief Counsel

Electronically submitted /s/ Nadia L. Luhr Staff Attorney

4326 Mail Service Center Raleigh, North Carolina 27699-4300

Telephone: (919) 733-6110

Email: nadia.luhr@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Motion on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 22nd day of November, 2021.

Electronically submitted /s/ Nadia L. Luhr